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May 29, 2024

Via ECF

Honorable Kenneth M. Karas  
United States District Court Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

Re: *USA v. Rafael Ventura Paula*  
23-Cr-452 (KMK)

Dear Judge Karas:

I'm writing to supplement my request that Mr. Ventura Paula be permitted to stay at his daughter's residence in Connecticut from June 21st through June 24th to attend his granddaughter's graduation as well as a going away to college party. The letter also answers an inquiry received from Chambers about the position of the Government and Pretrial Services on this request.

As indicated in my initial request, the Government has consented to this application. After repeated attempts, I have now heard back from Mr. Ventura Paula's Pretrial Services Officer who stated that as a policy the agency does not approve of overnight visits for defendants who are on home monitoring. Nevertheless, I am going to ask the Court to permit Mr. Ventura Paula to attend these significant events in his granddaughter's life.

This Court granted permission for Mr. Ventura Paula to stay at his daughter's home in Connecticut for several days over the past Christmas holidays. Mr. Ventura Paula advised Pretrial Services of his travel dates and where he would be staying. The visit occurred and there has not been a scintilla of any allegation that Mr. Ventura Paula conducted himself improperly. It certainly bears noting that there has never been an allegation that Mr. Ventura Paula has violated the conditions of his release. Mr. Ventura Paula is in his 80s and there are not many significant family celebrations for him to look forward to and I am asking that the Court grant my request.

Granted on the condition that Mr. Ventura Paula advises  
Pre-Trial Services of his travel itinerary, including  
locations of where he would be staying.

Respectfully submitted,

Kerry A. Lawrence

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So Ordered

5/29/24

cc: AUSA David Markewitz (via ECF)  
PTSO Ashley Cosme (via Email)